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Attorneys for the United States

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

RYAN CHAMBERLAIN,

Defendant.

Case No. CR 14-316 VC

STIPULATION AND ~~PROPOSED~~
ORDER TO CONTINUE
AS MODIFIED

The parties are jointly requesting that the status conference presently set for March 30, 2015 at 2:00 p.m. be continued to April ²⁸~~27~~, 2015 at ¹~~2~~:00 p.m.

As the Court is aware, the above captioned matter is a complicated case with voluminous discovery. On March 17, 2015, based on an earlier defense request, the government provided new discovery on the issue of abrin toxicity, including peer-reviewed literature and a statement by Christa L. Mason, PhD., a forensic examiner within the Chemical, Biological, Radiological, and Nuclear Sciences Unit at the FBI Laboratory in Quantico, Virginia. The parties believe that additional time is needed to properly assess this material. The parties have also been working diligently to resolve the case, but have

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yet to reach a resolution. The parties believe that additional time would also be beneficial to resolving the case as communications have been fruitful thus far.

Both government counsel and counsel for the defense will be out of the country on successive pre-planned trips from April 2, 2015 through April 20, 2015.¹ Consequently, to ensure continuity of counsel, the parties are seeking a continuance until April 27, 2015 at 2:00 p.m.

For the above reasons, the parties stipulate there is good cause – taking into account the public interest in the prompt disposition of this case – to exclude the time from March 30, 2015 to April 27, 2015 from computation under the Speedy Trial Act, and that failing to exclude that time would unreasonably deny the defendant and his counsel the reasonable time necessary for effective preparation of counsel taking into account the exercise of due diligence. 18 U.S.C. § 3161(h)(7)(A) and (B)(iv). The parties further agree that the ends of justice would be served by excluding the time from March 30, 2015 to April 27, 2015 from computation under the Speedy Trial Act and that the need for the exclusion outweighs the best interests of the public and the defendant in a speedy trial.

IT IS SO STIPULATED.

DATED March 18, 2015

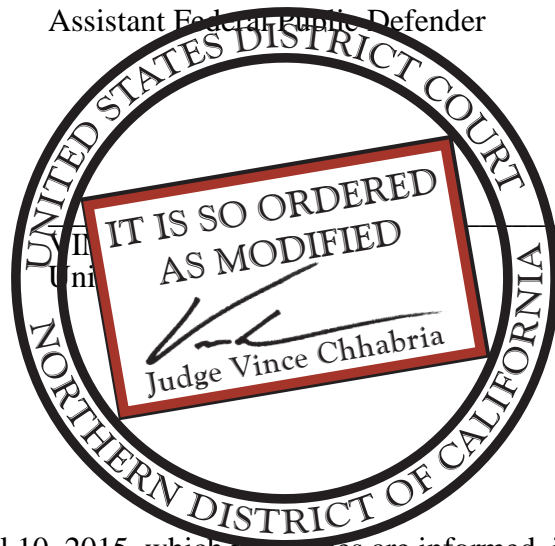
/s/
PHILIP J. KEARNEY
Assistant United States Attorney

DATED March 18, 2015

/s/
JODI LINKER
Assistant Federal Public Defender

IT IS SO ORDERED.

March 18, 2015
DATED



¹ With the exception of a single day, Friday April 10, 2015, which the parties are informed, is not available to the Court.